

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JUKEN W. GORDON, :  
 :  
 Plaintiff, : No. 1: CV 01-0331  
 :  
 v. : (Judge Rambo)  
 :  
 N. GONZALEZ, *et al.*, : Electronically Filed  
 :  
 Defendants. :

PLAINTIFF'S MOTION FOR  
ENLARGEMENT OF DISCOVERY DEADLINE  
AND TRIAL CONTINUANCE

\_\_\_\_AND NOW comes Plaintiff Juken W. Gordon, through David L. Glassman  
his attorney, to request continuance of trial for the following reasons:

1. On July 29, 2004, Plaintiff filed a Motion for Enlargement of Time to  
Complete Discovery – specifically, the deposition of William Reish, M.D. – due  
to the unavailability of Lori Cunningham, Supervisory Attorney for U.S.P. -  
Lewisburg (see Doc. 87).

2. On July 29, 2004, the Court granted the unopposed Motion, extended  
the discovery deadline to August 27, 2004, and continued trial from the October to  
the November 2004 trial list.

3. Between July 29 and August 22, 2004, defense counsel provided the  
Plaintiff with no dates convenient for Ms. Cunningham to attend a deposition.

4. On August 23, 2004, defense counsel called undersigned counsel to propose the instant continuance motion to accommodate the request of the plaintiff to depose Dr. Reish.

5. Defense counsel advised undersigned counsel that he expects his defense team to be available to attend a deposition in September 2004.

6. Plaintiff also is in the process of supplementing his responses to defense discovery requests with additional medical records recently received.

7. Defense counsel requested undersigned counsel to include a request for enlarge the entire case management schedule so as to continuance trial until the February 2005 Trial List due to the busy litigation docket of defense counsel until that time.

WHEREFORE, plaintiff Juken W. Gordon requests that the Court enlarge the discovery and case management deadlines and continue the trial in this matter from the November 2004 Trial List to the February 2005 Trial List.

Respectfully Submitted,  
s/David L. Glassman, Staff Attorney  
Lewisburg Prison Project, Inc.  
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Lewisburg, PA 17837  
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PA ID #51200  
Attorney for Plaintiff Juken W. Gordon

Date: August 24, 2004

CERTIFICATE OF SERVICE

\_\_\_\_\_I certify that I served today the foregoing “Plaintiff’s Motion for  
Enlargement of Discovery Deadline and Trial Continuance” upon the following  
individuals and in the following manner:

VIA ECF EMAIL NOTICE

\_\_\_\_\_Michael J. Butler, Assistant U.S. Attorney  
U.S. Attorney’s Office  
Harrisburg, PA  
Email: [Michael.J.Butler@usdoj.gov](mailto:Michael.J.Butler@usdoj.gov)

s/David L. Glassman, Staff Attorney  
Lewisburg Prison Project, Inc.  
P.O. Box 128  
Lewisburg, PA 17837

Date: August 24, 2004